

**IN THE UNITED STATE DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

---

RACHEL RAMSBOTTOM	)	
ALEXIS BOWLING and	)	
JENNA HOUSTON	)	
	)	CIVIL ACTION
	)	
Plaintiffs	)	No. 3:21-cv-00272
	)	
v.	)	JURY TRIAL DEMANDED
	)	
LORIN ASHTON,	)	
AMORPHOUS MUSIC, INC.,	)	
BASSNECTAR TOURING, INC.,	)	
C3 PRESENTS, L.L.C.,	)	
INTERACTIVE GIVING FUND,	)	
GNARLOS INDUSTRIES, LLC,	)	
CARLOS DONOHUE; ABC	)	
CORPORATIONS, ONE THROUGH	)	
TEN (said Names Being Fictitious),	)	
JOHN DOES, ONE THROUGH TEN	)	
(said Names Being Fictitious)	)	
	)	
Defendants.	)	

---

**PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANT LORIN ASHTON'S  
PARTIAL MOTION TO DISMISS COUNT IV**

Plaintiffs, Rachel Ramsbottom, Alexis Bowling, and Jenna Houston,<sup>1</sup> hereby submit by and through their counsel, Laffey, Bucci & Kent, LLP, their Response in Opposition to Defendant Lorin Ashton's Partial Motion to Dismiss Count IV, and respectfully move this Honorable Court to deny Defendant's Motion to Dismiss.

The arguments and authorities advanced in support of this Response in Opposition are set forth in the accompanying Memorandum of law.

---

<sup>1</sup> Plaintiff Jane Doe #1 has voluntarily dismissed her claims without prejudice.

Respectfully submitted,

**MILLER LAW OFFICES**

By: /s/ Phillip Miller  
Phillip Miller, #006873  
*Attorney for the Plaintiff*  
631 Woodland Street  
Nashville, TN 37206  
615-356-2000 phone  
615-242-1739 fax  
pmiller@seriousinjury.com

**LAFHEY, BUCCI & KENT, LLP**

Brian Kent\*  
M. Stewart Ryan\*  
Alexandria MacMaster\*  
LAFHEY, BUCCI & KENT, LLP  
1100 Ludlow Street, Suite 300  
Philadelphia, PA 19107  
(T): (215) 399-9255  
(E): bkent@lbk-law.com  
sryan@lbk-law.com  
amacmaster@lbk-law.com

*\*admitted pro hac vice*

Date: August 16, 2021